

REMARKS

The Office Action of November 27, 2009 has been carefully considered. Reconsideration of this application is respectfully requested. The Listing of Claims above includes amendments to claim 17 intended to clarify the limitations therein.

Turning now, to the office action, the sole remaining rejection in this application is a rejection of claims 1-20 under 35 U.S.C. 103(a) as being unpatentable over Raveis, JR (US2001/0005829; "Raveis") in view of Hibbert et al., (US2006/0074793; "Hibbert").

Applicants respectfully traverse the rejection of the claims under 35 U.S.C. §103(a) for the reasons set forth below. With respect to the rejection set forth, it is deficient in that there is no particular basis for rejection set forth for apparatus claim 7 or method claim 17. While it appears that the Examiner has somehow equated such claims and has attempted to address them with respect to claim 1, Applicants respectfully note that the claims include different limitations and as such a discussion merely of claim 1 is not believed to result in a basis for setting forth the rejection of independent claims 7 and 17. Accordingly, *prima facie* obviousness has not been established for all of the claims being rejected.

While Applicants respectfully question the merits for combining Raveis and Hibbert, such arguments are respectfully reserved in the event the rejection is maintained. Rather, Applicants note that even if the arguable combination is considered, the Examiner has, once again, failed to establish a teaching of each of the recited limitations set forth in the independent claims 1, 7 and 17. As now acknowledged by the Examiner, Raveis does not teach a database having a first with embedded rules that define a workflow or a second table defining at least one attribute of a display of information as recited in rejected claims 1 and 7. Nor does Raveis describe following a work-flow for a transaction defined by at least embedded rules in a first database table, providing access to the database for the plurality of users, via a user interface, and dynamically controlling the user interface as a function of data stored in the second table as set forth in claim 17. Applicants respectfully urge that Hibbert, either alone or in combination with Raveis, also fails to teach the limitations in claims 1, 7 or 17.

With respect to the Examiner's allegation that Hibbert's disclosure of a transaction management system 50 results in a teaching of the noted limitations of claims 1, 7 or 17, Applicants respectfully urge that no such teaching has been established. For example, the rejection fails to indicate where the recited tables with embedded rules and attributes of a display are disclosed as being found within a database (or the use of such tables as now recited in claim 17). Relative to the latter display attributes, the rejection urges that such a teaching arises from Hibbert's disclosure of "...Transaction management system 50 includes web server or other functionality allowing for the generation of HTML pages ..." Notably, the Examiner has not identified where such teaching is disclosed, nor where the "other functionality" is discussed. Thus, at best, the rejection is incomplete.

Apparently recognizing the deficiencies in the rejection the Examiner then urges, again without support, that "[i]t is old and well known in the art of computer science that workflows are used to define a pre-defined set of rules and that computers are used for automating these workflows." In the event the rejection is maintained, Applicants respectfully request that the Examiner substantiate the assertion. However, even if substantiated, such information still fails to teach or suggest the specific limitations as set forth in the claims. At page 5 of the Office Action, the Examiner has also stated several positions as to apparent interpretations of Hibbert, and particularly, an expansion of such teachings – apparently in order to provide a basis for the obviousness rejection. Again, Applicants respectfully challenge such an interpretation and further submit that even if substantiated, the Examiner's position is contrary to the claim language – where the embedded rules are found in a database table (and are not hard-coded in a work flow management engine). Relative to the HTML page resulting in a teaching of a database table defining attributes of a display, Applicants respectfully urge that the teachings again fall short of the recited limitations as no teaching of an attribute of a display has been taught.

Finally, apparently as a further justification for ignoring specific limitations of the independent claims, the Examiner urges that the recited "contents of the database" are considered non-functional descriptive language. Again Applicants respectfully challenge such an interpretation. In response Applicants note that claims 1 and 7 include the limitations in a manner that alters the recited structural elements (e.g., operation on work-flow defined by embedded rules; user interface dynamically controlled as a function of attributes) and that amended method claim 17 expressly

indicates that the embedded work-flow rules and attributes of a display are indeed functionally involved in the steps recited. Moreover, the use of database tables in such a fashion is a new and non-obvious application or use of such tables – as further evidenced by the Examiner's failure to identify such use in any references.

In view of the various arguments set forth above, Applicants respectfully request that the rejection of claims 1, 7 and 17 be withdrawn and the claims indicated as allowable. With respect to dependent claims 2-6, 8-16 and 18-20, for purposes of brevity Applicants have not set forth specific arguments in traversal of the rejection of these claims. However, Applicants reserve the right to independently argue the merits of such claims in a subsequent response or on appeal in the event the rejection is maintained.

In view of the foregoing remarks and amendments, reconsideration of this application and allowance thereof are earnestly solicited. In the event that additional fees are required as a result of this response, including fees for extensions of time, such fees should be charged to USPTO Deposit Account No. 50-2737 for Basch & Nickerson LLP.

In the event the Examiner considers personal contact advantageous to the timely disposition of this case, the Examiner is hereby authorized to call Applicant's attorney, Duane C. Basch, at Telephone Number (585) 899-3970, Penfield, New York.

Respectfully submitted,

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